UNITED STATES DISTRICT COURT DISTRICT OF BOSTON, MASSACHUSETTS

SUFFOLK, ss

Docket No: 05 CV 11096 7/6-

Donna Layne, Plaintiff

V.

Lori Bullen, Marsha Cannon, Inspector Harrington, Allen Douillette, Defendants

PLAINTIFF'S REQUEST FOR DEFAULT JUDGMENT

Now comes the Plaintiff, Donna Layne, in the above entitled action and says that the Defendants, Lori Bullen, Marsha Cannon, Inspectors Harrington and Douillette, were defaulted on the 8th day of November, 2005. Her claim is for a sum certain or for a sum which can, by computation, be made certain; wherefore the plaintiff requests that judgment enter against defendants in the amount of \$565,000.00, together with interest and costs.

Respectfully submitted, By Donna Layne By her attorney,

Eugene C. Johnson, Esq.

BBO #: 659713

264 Broadway - Suite 502 Methuen, Massachusetts 01844

(978) 691-5544

AFFIDAVIT

I, Eugene C. Johnson, of 264 Broadway Suite 502, Methuen Massachusetts, 01844, under the pains and penalties of perjury, say that:

- 1. I am a member of the Massachusetts Bar in good standing and have been sworn in to practice in the federal court.
- 2. A complaint was filed May 11, 2005.
- 3. Defendants were served a copy of the complaint and summons on September 7, 2005.
- 4. The Defendants answer was due on/by November 8, 2005.
- 5. That the defendants are not infants or incompetent persons.
- 6. That the defendants are not in the military service of the United States or its Allies as defined in the Soldiers' and Sailors Civil Relief Act of 1940, as amended.
- 7. Neither defendants nor Defendants' attorney filed a timely answer to the above referenced complaint thereby placing them in default. Defendants, being in default, are not entitled to file a motion to dismiss.

8. Plaintiff is entitled by law to a default judgment in her favor.	
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Signed this _____ day of _____ cem box , 2005 under the penalties of perjury.

Eugene C. Johnson, Esq.

BBO #: 659713

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Methuen, Massachusetts 01844

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CERTIFICATE OF SERVICE

A copy of this Request For A Default Judgment and supporting affidavit have been served on the Defendants by delivering a copy, postage prepaid, to Assistant U.S. Attorney Rayford Farquhar, located at John Joseph Moakley Courthouse, 1 Courthouse Way, Boston, MA 02210.

Dated: December 15, 2005

Eugene C. Johnson, Esq.